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Federal Reporter, 540, appears to be rather novel. It is there held that goats placed on land for the sole purpose of destroying brush and weeds thereon and keeping down the grass are fixtures. This decision is, of course, based on the civil law, and in the opinion the court notes that in France it has been held that cows attached to dairy farms are fixtures or immovables.

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**Testamentary Capacity of Spiritualist.**—The Michigan Supreme Court in *O'Dell v. Goff*, 112 Northwestern Reporter, 736, holds that mere belief in spiritualism is not evidence of insanity, but, on the other hand, one who thinks so persistently on the subject as to become a monomaniac, incapable of reasoning, does not possess testamentary capacity; and, where a believer in spiritualism has such confidence in spiritualistic communications through mediums or otherwise that he is compelled to follow them blindly, his free agency is destroyed, and a will made under such circumstances cannot be admitted to probate, whether such conclusion be based on incapacity or undue influence. See note to *Wallen v. Wallen*, 13 Va. Law Reg. 539.

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**Animals—Injury to Dog—Actions.**—The right of the owner of a dog to maintain an action against one who wantonly and maliciously kills or injures it is sustained in *Columbus Railroad Co. v. Woolfolk* (Ga.), 10 L. R. A. (N. S.) 1136.

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**Arrest—Necessity for Warrant.**—A police officer is held, in *Klein v. Pollard* (Mich.) 10 L. R. A. (N. S.) 1008, to have no authority to arrest without warrant a woman who is walking quietly along the street after emerging from a disorderly saloon at midnight. See *Muscoe v. Com.*, 86 Va. 443.

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**Automobiles—Regulation—Class Legislation.**—A law regulating the use of automobiles alone, of all the vehicles which use the highway, is held, in *State v. Swagerty* (Mo.) 10 L. R. A. (N. S.) 601, not to be invalid special legislation.

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**Automobiles—Frightening Horses—Liability.**—One stopping an automobile in front of a corner store is held, in *House v. Cramer* (Iowa) 10 L. R. A. (N. S.) 655, not to be liable for the running away of a team hitched near the corner on a side street, although he permitted the explosions to continue after the machine stopped, if, after he saw that the team was frightened, he could not have stopped the noise in time to obviate the escape of the team.

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**Insolvent Banks—Constructive Trusts.**—Money received by an insolvent banker for the purchase of a draft which he knows to be